

Exhibit D

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

STEVEN HOTZE, M.D.; WENDELL
CHAMPION; HON. STEVE TOTH; and
SHARON HEMPHILL,

Plaintiffs,

v.

CHRIS HOLLINS, in his official capacity as
Harris County Clerk;

Defendant.

Case No. 4:20-cv-03709

DECLARATION OF YEKATERINA SNEZHKOVA

1. My name is Yekaterina Snezhkova. I am over 18 years of age and am competent to make this declaration.

2. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.

3. I am registered to vote in Harris County. I have been registered to vote in Harris County since approximately 2014. I am currently employed as a Director of Enrichment at the Village of River Oaks, a senior living center.

4. I am a regular voter.

5. I voted in the November 2020 election during the early voting period using drive-through voting.

6. On October 13, 2020, I utilized drive-through voting at the Houston Community College location. The address for the Houston Community College location is 5601 West Loop South, Houston, TX 77081.

7. I utilized drive-through voting because it was the most convenient method of voting for me. I voted while I was on my way to work in the morning.

8. At the Houston Community Center drive-thru location, there were about 20 parking slots with individual tents for each car.

9. Once I pulled into the location, someone directed my car into an open slot, where I parked underneath a tent and waited for a poll worker to approach my car.

10. The poll worker checked my driver's license and confirmed my address. I signed in to vote, and the poll worker printed out my slip with a four-digit access code. The poll worker handed me the tablet directly. She moved away from my car while I voted to give me privacy. I voted, then handed the tablet back to the poll worker.

11. My drive-through voting experience was very positive. I found that method of voting to be safe and secure.

12. I recently learned about this lawsuit and the possibility that ballots cast using the drive-through voting process might be thrown out. I am very concerned that my ballot will be thrown out and that I will be disenfranchised in the November 2020 election.

I declare that the foregoing is true and correct under penalty of perjury. Executed this 1st day of November, 2020, in Houston, Harris County, Texas.

A handwritten signature in black ink, appearing to read 'Yekaterina Snezhkova', written over a horizontal line.

Yekaterina Snezhkova